

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Holt, et al. v. National Football League, et al. (Plaintiffs Earl Edwards and Janice Edwards ONLY)

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS EARL EDWARDS  
AND JANICE EDWARDS**

Charles S. Zimmerman, J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Earl Edwards and Janice Edwards only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Earl Edwards and Janice Edwards.
2. Plaintiffs' counsel filed a short form complaint for Earl Edwards and Janice Edwards on August 10, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Earl Edwards, Janice Edwards, and the undersigned.

4. Plaintiffs' counsel properly notified Earl Edwards and Janice Edwards of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Earl Edwards and Janice Edwards only in Court File No. 2:12-cv-4185-AB.

Dated: February 25, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

---

Charles S. Zimmerman (#120054)  
J. Gordon Rudd, Jr. (#222082)  
Brian C. Gudmundson (#336695)  
Michael J. Laird (#0398436)  
1100 IDS Center, 80 South 8th Street  
Minneapolis, MN 55402  
Telephone: (612) 341-0400  
Facsimile: (612) 341-0844  
Charles.Zimmerman@zimmreed.com  
Gordon.Rudd@zimmreed.com  
Brian.Gudmundson@zimmreed.com  
Michael.Laird@zimmreed.com